

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 18-CR-477-WJ
)	
RAYMOND THOMAS CLARK,)	
)	
Defendant.)	

**UNITED STATES' RESPONSE TO
DEFENDANT'S SENTENCING MEMORANDUM**

The United States hereby responds to Defendant Raymond Clark's Sentencing Memorandum. Although the defendant's criminal history and offense conduct are troubling, the guideline range in this case adequately takes into account those considerations and the defendant is facing a significant period of imprisonment as a result (a range of over 10 and a half to 13 and a half years of imprisonment). Additionally, while the circumstances of the defendant's upbringing do not in any way excuse his criminal conduct, it is not surprising that the defendant has gone down the path that he has. Given these factors, and the others identified in the defendant's Sentencing Memorandum, the United States does not oppose a sentence at the low end of the guideline range, which amounts to a nearly 11 year term of incarceration. The United States further

requests that the Court impose a term of supervised release of three years.

Respectfully submitted,

JOHN C. ANDERSON
United States Attorney

/s/
DUSTIN C. SEGOVIA
Assistant United States Attorney
200 N. Church Street
Las Cruces, New Mexico 88001
Phone: (575) 522-2304

I HEREBY CERTIFY that I have electronically filed the foregoing with the Clerk of the Court using the CM/EMF system which will send notification to opposing counsel of record on this date.

Filed electronically on 11/14/2018 by
DUSTIN C. SEGOVIA
Assistant United States Attorney